

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:
GUILLERMO PALLARES
CARMEN C. PALLARES
Debtor(s)

§
§
§
§

Case No. 18-30888-HCM

Chapter 7

RESPONSE TO MOTION OF BANK OF AMERICA, NA
TO LIFT AUTOMATIC STAY

Ronald E. Ingalls, Chapter 7 Trustee, files this Response to Motion of Bank of America, NA, to Lift Automatic Stay, and would show the Court as follows:

1. The allegations of paragraph 1 through 4 are admitted.
2. The Trustee is without sufficient information to admit the allegations of paragraphs 5 through 9, and therefore denies the same.
3. The allegations of paragraph 10 are denied. The Motion itself discloses a debt of approximately \$20,000, but shows that the property may be worth \$182,000. The Trustee has employed a real estate broker, and expects this property to sell soon. There is sufficient equity to adequately protect the Movant.

WHEREFORE, PREMISES CONSIDERED, Ronald E. Ingalls, Chapter 7 Trustee, prays that the Court deny the Motion of Bank of America, NA, to Lift Automatic Stay, regarding the property described as 8524 A Wingo Way, El Paso Texas and for other just relief.

/s/ Ronald E. Ingalls
Ronald E. Ingalls
Chapter 7 Trustee
SBT 10391900
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Fredericksburg, TX 78624
Tel: (830) 321-0878
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Email: ron@ingallstrustee.com

CERTIFICATE OF SERVICE

The signature above certifies that a true and correct copy of the foregoing document has been served by first class, U.S. mail, postage prepaid via the noticing center with service ordered on February 12, 2019, on the following:

United States Trustee - EP12
United States Trustee
615 E Houston Ste 533
San Antonio, TX 78205-2055

Pallares, Guillermo And Pallares, Carmen C.
8520 Wingo Way
El Paso, TX 79907

Bank of America, NA
c/o Megan F. Clontz, Esq
2201 W Royal Lane Ste 155
Irving, TX 75063

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